

## Danner, Ward

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**From:** Dotson, Greg <Greg.Dotson@mail.house.gov>  
**Sent:** Wednesday, December 11, 2013 1:19 PM  
**To:** Maier, Brent; Orleans, Raisa  
**Cc:** Armann, Steve; Wilson, Patrick; Santos, Carmen; Vaught, Laura; Zito, Kelly; Mogharabi, Nahal  
**Subject:** RE: PCB's in Malibu High School & Meeting at Malibu City Hall  
  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Thank you. By the way, are PCBs typically associated with any specific types of cancers?

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**From:** Maier, Brent [mailto:Maier.Brent@epa.gov]  
**Sent:** Wednesday, December 11, 2013 4:16 PM  
**To:** Dotson, Greg; Orleans, Raisa  
**Cc:** Armann, Steve; Wilson, Patrick; Santos, Carmen; Vaught, Laura; Zito, Kelly; Mogharabi, Nahal  
**Subject:** PCB's in Malibu High School & Meeting at Malibu City Hall

Greg Dotson  
Energy and Environment Staff Director, Committee on Energy and Commerce

Raisa Orleans  
Office of Representative Henry A. Waxman

Greg/Raisa -

Thanks for making the time available to speak with our office about the PCB issue at Malibu High School. As a follow up to our call earlier today, please find attached the information about the meeting on Thursday at Malibu City Hall and the requested e-mail of November 21, 2013 from Steve Armann to Superintendent Sandra Lyon. Please share this with Lisa Pinto in Congressman Waxman's District Office. Please let us know if we can be of any further assistance.

Regards,

Brent Maier  
Congressional Liaison  
U.S. Environmental Protection Agency, Region IX  
75 Hawthorne St. (OPA-3)  
San Francisco, CA 94105  
Ph: 415.947.4256

**From:** Wahrenbrock, Sarah [mailto:swahrenbrock@smmusd.org]  
**Sent:** Tuesday, December 10, 2013 2:16 PM  
**To:** Wilson, Patrick; Armann, Steve; [sblack@dtsc.ca.gov](mailto:sblack@dtsc.ca.gov); Cyrus Rangan ([crangan@ph.lacounty.gov](mailto:crangan@ph.lacounty.gov)) ([crangan@ph.lacounty.gov](mailto:crangan@ph.lacounty.gov)); [abellomo@ph.lacounty.gov](mailto:abellomo@ph.lacounty.gov); Loaretta Keith  
**Cc:** Lyon, Sandra; [mkatchen@phylmar.com](mailto:mkatchen@phylmar.com)  
**Subject:** FYI: Message RE: Thursday's Study Session

Dear Environmental Experts,  
The superintendent asked that I share the below email with you as a courtesy. It has been shared with our school communities and the Malibu Schools Environmental Task Force.

\*\*\*This email was sent on behalf of Superintendent Lyon.\*\*\*

Dear All,

This Thursday, December 12, the Board of Education's regular meeting will be relocated to Malibu City Hall and preceded by a two-hour study session, which will allow the Board to examine in-depth the current questions, concerns and action plan regarding environmental health at the Malibu schools.

Board Study Session Details

- 6:00-8:00 p.m.
- Malibu City Hall

Board Regular Meeting

- Closed session 4:30-6:00 p.m.
- Regular meeting 6:00 p.m.

Agenda for Study Session:

- I. Background/Action to Date  
Malibu School Community's Health Concerns and Questions
- II. Next Steps/Continued Testing and Improved Maintenance Efforts
- III. Input from Government Environmental and Health Agencies

Invited to attend/present and take Board and community:

Steve Armann, PCB Program Coordinator, Environmental Protection Agency (EPA)  
Region 9

Patrick Wilson, Ph. D., Senior Regional Toxicologist, EPA, Region 9

Tom Cota, Branch Chief, School Evaluation & Brownfield Outreach, Department of Toxic Substance Control  
(DTSC)

Angelo Bellomo, Director, Environmental Health, Los Angeles Department of Public Health (DPH)

IV. Public Questions (30 minutes)

Note: Throughout the meeting, all attendees are welcome to submit questions in writing to the Board President, who will work to integrate them into the discussion and/or secure responses through a follow-up Q and A, which will be posted on the District website.

V. Board to Review/Give Direction on the Proposed Next-Steps Action Plan

The meeting location was selected to provide convenient access for Malibu employees and residents; however, if you are unable to attend, the meeting will be replayed on in Malibu on Government Access Ch. 3 every Saturday at 8:00 p.m. and posted online at [http://santamonica.granicus.com/ViewPublisher.php?view\\_id=5](http://santamonica.granicus.com/ViewPublisher.php?view_id=5).

If you have questions, please feel free to submit them in writing to Sarah Wahrenbrock, my administrative assistant, at [mhsfaq@smmusd.org](mailto:mhsfaq@smmusd.org); we will strive to respond to all questions within 24 hours.

Thank you,  
Sandra Lyon  
Superintendent

**From:** Armann, Steve

**Sent:** Thursday, November 21, 2013 3:57 PM

**To:** 'Lyon, Sandra'

**Cc:** Huetteman, Tom; Scott, Jeff; Barhite, Steven; Wilson, Patrick; Santos, Carmen; Baylor, Katherine; Taylor, Katherine; Keener, Bill; Tyahla, Stephen; Mogharabi, Nahal; Heller, Zoe; Beach, John; Priselac, Adrienne; Campopiano, Jorine; John, Steven; Kennedy, Aisha; McDaniel, Doug; 'tcota@dtsc.ca.gov'

**Subject:** PCB's in Malibu High School

Dear Sandra:

We appreciate the opportunity to speak with you, representatives of the Malibu Middle and High Schools Environmental Task Force (Task Force), and representatives from other regulatory agencies that participated in the call yesterday afternoon. Until now, EPA's role in this matter has been to provide technical assistance to you and the Task Force. However, during yesterday's call we were informed that caulk samples show concentrations of PCBs above 50 ppm.

PCBs in caulk or other building materials at 50 ppm or above is not authorized for use under the Toxic Substances Control Act (TSCA). As such, the School District will need submit for EPA approval a PCB Cleanup Plan consistent with requirements in 40 CFR 761.61(c). In general, we envision that the plan will include the steps described in General Steps for Cleanup Plan noted at the end of this message. I recommend that we schedule a meeting by mid December 2013 to discuss the cleanup plan in more detail.

In reference to the indoor air data that you provided to EPA, we have completed a preliminary review of that data. **The PCB concentrations observed in the 10 air samples collected all show concentrations that are within EPA's acceptable risk range for PCB exposure in a residential setting.** A number of air samples also demonstrated "non-detect" results. Consistent with our discussion yesterday, our residential exposure scenarios assume that individuals are exposed to contaminated media 24 hours a day, 350 days/yr, for 30 years. This is a much more conservative exposure setting than would be expected in a typical school exposure scenario.

EPA has also developed site-specific exposure scenarios for schools which assume that children are exposed in the classroom setting for 10 hrs/day, 180 days/yr, for 6 years. **Our preliminary review of the airborne sampling results confirmed that all observations, albeit limited, are well below the health-based thresholds established by EPA for elementary & high school age children, and adult staff.** We are still conducting a comprehensive review of the wipe sample data.

Based on the preliminary results & limited sampling information available to us to date, we have no reason to believe that there is an immediate or acute threat to the health of the children or the staff at the school from the levels of PCB contamination found.

In light of the fact that certain caulk samples exceed 50 ppm PCBs and wipe samples are showing PCBs in surface areas, we recommend that the School District consider implementing appropriate Best Management Practices (BMPs) as described in EPA's Fact Sheet, "PCBs in Caulk in Older Buildings," December 20, 2012 (<http://www.epa.gov/pcbsincaulk/#determine>). These BMPs may include:

- Encouraging children to wash their hands with soap and water often and before eating.
- Cleaning to reduce dust and residue inside buildings.
  - Use vacuums with high-efficiency particulate air (HEPA) filters.
  - Use a wet or damp cloth or mop to clean surfaces.

- Do not sweep with dry brooms; minimize the use of dusters.
- Wash surfaces, windowsills, walls, and objects often in rooms known to have PCB-containing caulk or other PCB containing materials.
- Ventilating rooms before being occupied (bring in fresh air).

We are available to discuss implementation of BMPs at your earliest convenience. We would consider implementation of BMPs to be “interim actions to reduce risk” and not a final cleanup plan.

Additional information on research that EPA has conducted on PCBs in schools is available in the document “Polychlorinated Biphenyls (PCBs) in School Buildings: Sources, Environmental Levels, & Exposures” (EPA/600/R-12/051/Sept 30, 2012/ [www.epa.gov.ord](http://www.epa.gov.ord)).

### **General Steps for Cleanup Plan**

- Inspection of school buildings to identify via observation, and where applicable via testing, other potential sources of PCBs such as paint, fluorescent light ballasts, window glaze material, and ceiling tiles.
- Removal and disposal of caulk material and any other source(s) of PCBs present at the school. Disposal to be consistent with TSCA and state regulations.
- Testing of surfaces (e.g., concrete, masonry, metal) underlying the caulk or other PCB material such as paint.
- Cleanup of surfaces that have been in contact with PCB sources such as caulk consistent with a cleanup level to be established by EPA and procedures to be approved in the plan.
- Inspection of the ventilation system and collection of bulk dust samples for analysis, if in sufficient amount. Wipe samples should be collected, otherwise.
- Cleaning of the ventilation system, if necessary; and demonstration of the system’s efficacy pre and post cleanup.
- Sampling and analysis of soils within 3 to 5 feet from school buildings; and removal of soils containing PCBs above a cleanup level to be established by EPA.
- Post-cleanup re-testing of indoor air within the school to verify cleanup efficacy. This testing is to include collection of background outdoor air samples.
- Post-cleanup re-testing of critical surfaces within the school building such as student desks, teachers’ desks, and tables.
- Sampling and Analysis Plan detailing sampling and laboratory analysis procedures.
- Schedule to conduct the tasks required in the cleanup plan.

Although the list of tasks above may seem overwhelming, we will work with the School District to ensure the cleanup is planned in an efficient and effective manner. If you have any questions please feel free to call me or my staff. We look forward to working with you to address this situation. Thank you.

Steven S. Armann, Manager  
RCRA Corrective Action Office  
USEPA Region 9  
75 Hawthorne Street  
San Francisco, CA 94105

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